

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC and the
Estate of Bernard L. Madoff,

Plaintiff,

v.

ROBERT AUERBACH REVOCABLE TRUST dtd
6/29/05;

JOYCE C. AUERBACH REVOCABLE TRUST dtd
6/29/05; and

JOYCE C. AUERBACH, individually, as Trustee of
the Robert Auerbach Revocable Trust dtd 6/29/05, and
as Trustee of the Joyce C. Auerbach Revocable Trust
dtd 6/29/05, and as Personal Representative of the
Estate of Robert Auerbach,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04891 (SMB)

STIPULATION FOR ENTRY OF SCHEDULING ORDER

WHEREAS, Irving H. Picard (the "Trustee"), as trustee for the liquidation of the

business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act and the substantively consolidated estate of Bernard L. Madoff individually, and defendants (i) Robert Auerbach Revocable Trust dtd 6/29/05, (ii) Joyce C. Auerbach Revocable Trust dtd 6/29/05, and (iii) Joyce C. Auerbach, individually, as Trustee of the Robert Auerbach Revocable Trust, as Trustee of the Joyce C. Auerbach Revocable Trust, and as Personal Representative of the Estate of Robert Auerbach (collectively, "Defendants"), by and through their respective counsel, met and conferred regarding the following schedule.

IT IS THEREFORE MUTUALLY AGREED AND STIPULATED, by and between the Trustee and Defendants, as follows:

1. The deadline for Trustee to file a Motion for Summary Judgment is August 12, 2016.
2. The deadline for Defendants to respond to the Trustee's Motion for Summary Judgment is September 23, 2016.
3. The deadline for the Trustee to reply to Defendants' response to Trustee's Motion for Summary Judgment is October 14, 2016.
4. The Trial of this matter, set for August 3, 2016, and all related deadlines are stayed pending a ruling from the Court on the Trustee's Motion for Summary Judgment.
5. Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and no rights or defenses are waived by entering into this Stipulation.
6. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and

the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: June 30, 2016
New York, New York

BAKER & HOSTETLER LLP

By: /s/ *Nicholas J. Cremona*
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*Attorneys for Plaintiff Irving H. Picard,
Trustee for the liquidation of Bernard L.
Madoff Investment Securities LLC and the
Estate of Bernard L. Madoff*

Dated: June 30th, 2016
New York, New York

FOLKENFLIK & MGERITY LLP

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*Attorneys for Defendants Robert Auerbach
Revocable Trust dtd 6/29/05, Joyce Auerbach
Revocable Trust 6/29/05, and Joyce C.
Auerbach, individually, as Trustee of the
Robert Auerbach Revocable Trust dtd 6/29/05,
as Trustee of the Joyce Auerbach Revocable
Trust 6/29/05, and as Personal Representative
of the Estate of Robert Auerbach*

SO ORDERED

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE